

EXHIBIT C

**SCOPE OF WORK, SUBMITTAL REQUIREMENTS, AND
SCHEDULE
FOR CLEANUP ACTION
CITY PARCEL SITE**

This Scope of Work is to be used by the PLPs and their consultants to develop and execute plans and reports for the City Parcel Site. The PLPs shall furnish all personnel, materials, and services necessary for or incidental to preparing plans and reports, and for the implementation of the cleanup action as defined in the Final Cleanup Action Plan (FCAP), or with specific modifications that allow the building on Site to remain. Submittals of deliverables shall be prepared in accordance with WAC 173-340-840, General Submittal Requirements.

Task I. Letter of Intent

A letter of intent clearly defining the PLPs intent to abide by this Enforcement Order in good faith will be delivered to Ecology's Project Coordinator within 15 days of issuance of this Order.

Task II. Remedial Action Plan

The Remedial Action Plan shall include the contents of the following reports in accordance with WAC 173-340-400:

a) Engineering Design Report and the Construction Plans and Specifications under WAC 173-340-400 (4)(a) and (b), as appropriate to the Site and to the cleanup action specified in the FCAP or with Ecology's proposed modifications. This shall include a soil excavation plan, tank, drywell and drains removal plan, building removal plan (or building testing and cleaning plan), information on backfill emplacement, testing, compaction, final grading, and schedule, and copies of permits.

b) Compliance Monitoring Plan

This plan shall describe the monitoring to be performed during construction (protection monitoring), and during soil removal (performance monitoring) to meet the requirements of WAC 173-340-410. A Sampling and Analysis Plan/Quality Assurance Procedures Plan meeting the requirements of WAC 173-340-820 shall be included. After completion of the cleanup and removal activities, one round of

groundwater sampling shall be conducted to confirm that PCBs are not in groundwater.

c) Institutional Controls Plan

Institutional controls are required for the City Parcel and the City of Spokane properties because industrial soil cleanup levels were established for these areas. Institutional controls for the alleyway would be required if PCB levels above the unrestricted land use soil cleanup level will remain in the area.

This plan shall describe the measures to be undertaken to limit or prohibit activities that may interfere with the integrity of the cleanup action as required under WAC 173-340-440.

A copy of the draft restrictive covenant and legal descriptions of properties requiring the restrictive covenant shall be included.

If applicable, a financial assurance mechanism shall be included that would cover the cost associated with future building removal (if appropriate) and associated cleanup activities that would be required.

d) Health and Safety Plan

This plan is required for remedial actions as specified in WAC 173-340-810.

Deliverables: Remedial Action Plan – Draft
Remedial Action Plan – Final

Task III. Implementation of the Cleanup Action

Implementation of the cleanup action shall begin no later than 60 days after approval of the final Remedial Action Plan.

A Restrictive Covenant shall be recorded not later than 60 days after approval of the final Remedial Action Plan.

Construction shall be conducted in accordance with the Remedial Action Plan prepared under this Scope of Work.

Detailed records shall be kept of all aspects of the work performed during the operation and construction including materials used, items installed, tests and measurements performed.

Deliverables: Recorded Restrictive Covenant
Financial Assurance Mechanism (if necessary)
Progress Reports

Task IV. Cleanup Action Report

At the completion of cleanup implementation, a Cleanup Action Report is required. The engineer responsible for the supervision of the construction shall prepare:

1. As-builts reports that shall contain as built drawings and a documentation of all activities.
2. Documentation of any changes or modifications that were necessary and approved during the course of implementing cleanup actions.
3. Results of compliance monitoring.

Deliverables: Cleanup Action Report – Draft
Cleanup Action Report – Final

SCHEDULE OF TASKS/DELIVERABLES

Effective Date of Enforcement Order

Start

Task I

Confirmation Letter to Ecology on
Intent to Abide by Enforcement Order

15 days after start

Task II

Remedial Action Plan - Draft
Remedial Action Plan – Final

75 days after start
30 days after receipt of
Ecology's comments

Task III – Implementation of Cleanup Action

Start of implementation

No later than 60 days after
approval of Remedial Action
Plan

Recorded Restrictive Covenant

60 days after approval of
Remedial Action Plan

Progress reports

10th of every month

Task IV

Cleanup Action Report – Draft

60 days after completion
of construction

Cleanup Action Report – Final

30 days following receipt
of Ecology's comments